



MEMO ENDORSED

MURIEL GOODE-TRUFANT
Acting Corporation Counsel

**THE CITY OF NEW YORK
LAW DEPARTMENT**

100 CHURCH STREET
NEW YORK, NY 10007

Elisheva L. Rosen
Assistant Corporation Counsel
Phone: (212) 356-3522
Fax: (212) 356-2349
Email: erosen@law.nyc.gov

October 21, 2024

BY ECF

Honorable Barbara Moses
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Simone Samuels v. City of New York
22-CV-01904

Dear Judge Moses:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, attorney for the City of New York ("Defendant") in the above-captioned proceeding. I write to respectfully request that the upcoming discovery conference either be converted to a virtual conference or rescheduled.

On October 16, 2024, Plaintiff's counsel, on behalf of the parties, wrote to the Court to request an adjournment of the discovery conference. See ECF Dkt. No. 65. The Court graciously granted the adjournment and rescheduled the conference to November 4, 2024. See ECF Dkt. No. 66. When conferring with Plaintiff's counsel, the undersigned neglected to inform him that she would be in Washington, D.C., between November 4-6, 2024. Thus, the undersigned respectfully requests that the November 4, 2024 conference be converted from an in-person conference to a virtual conference. Or, in the alternative, the undersigned respectfully requests that the November 4, 2024 conference be rescheduled to either November 7, 12, 14, or 25-27. Plaintiff's counsel consents to these requests.

I thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ Elisheva L. Rosen
Elisheva L. Rosen
Assistant Corporation Counsel

cc: **By ECF**
John G. Koeltl
United States District Judge

Masai Lord
Lord Law Group
14 Wall Street, Suite 1603
New York, NY 10005
718-701-1002
lord@nycivilrights.nyc

Application GRANTED. The conference, previously scheduled for November 4, 2024, is hereby ADJOURNED to **November 7, 2024, at 10:00 a.m.** Before the conference, the parties must meet and confer in good faith and in real time (*i.e.*, in person, by phone, or by video conference) for at **least 30 minutes** with respect to all of the issues set forth in plaintiff's letter motion (Dkt. 62), including the identities of the requested custodians and the requested date ranges. After they have met and conferred, the parties must file a joint reply letter, no later than **November 1, 2024**, confirming that that have complied with this Order (including the date and time of their meet and confer) and describing, succinctly, any disputes that remain for judicial resolution. **SO ORDERED.**



Barbara Moses
United States Magistrate Judge
October 22, 2024